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nextSource, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO COURTHOUSE

DEMETRIC DI-AZ, OWEN DIAZ and  
LAMAR PATTERSON,

Plaintiffs,

vs.

TESLA, INC. DBA TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES,  
INC.; NEXTSOURCE, INC.,

Defendants.

Case No. 3:17-cv-06748-WHO  
*[Removed from Alameda Superior Court,  
Case No. RG17878854]*

**DEFENDANT NEXTSOURCE, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL IN  
SUPPORT OF SUMMARY JUDGMENT  
OR, IN THE ALTERNATIVE, MOTION  
FOR SUMMARY ADJUDICATION OF  
ISSUES**

Amended Complaint Filed: December 26, 2018

**MOTION**

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Defendant nextSource, Inc. respectfully requests an order sealing the physical copies in the Court's files of Exhibits B through E and Exhibits G and I to the Declaration of Juan Araneda in Support of Defendant nextSource, Inc.'s Motion for Summary Judgment or, in the alternative, Motion for Summary Adjudication of Issues. This motion is based on the Declaration of Juan Araneda in support thereof, and the documents to be sealed are laid out below:

<b>DOCUMENT</b>	<b>DESIGNATING PARTY</b>	<b>BASIS FOR SEALING</b>
Exhibit B: Exhibits 91 (CITISTAFF-0000006–CITISTAFF-0000007) and 178 (NS000025) to the Deposition of Kevin McGinn	Citistaff Solutions, Inc.; nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50)
Exhibit C: Exhibits 124 (TESLA-0000635-TESLA-0000636), 125 (TESLA-0000634), 127 (TELSA-0000646-TESLA-0000647), 130 (TESLA-0000004-TESLA-0000008), 132 (TESLA-0000730-TESLA-0000737), 134 (TESLA-0000317), 136 ((TESLA-0000320), 140 (CITISTAFF-0000009-CITISTAFF-0000010), and 142 (TESLA-0000752-TESLA-0000753) to the Deposition of Wayne Jackson	Tesla Inc.; Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50)
Exhibit D: Exhibits 1 (CITISTAFF-0000034-CITISTAFF-0000035), 3 (CITISTAFF-0000039), 14 (TESLA-0000005-TESLA-0000008), and 15 (CITISTAFF-0000050-CITISTAFF-0000055) to the Deposition of Owen Diaz, Vol. I	Citistaff Solutions, Inc.; Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50)

1 2 3	Exhibit E: Exhibit 33 (CITISTAFF-0000043- CITISTAFF-0000045) to the Deposition of Owen Diaz, Vol. II	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50)
4 5 6 7	Exhibit G: Exhibit 88 (CITISTAFF-0000001- CITISTAFF-0000003) to the Deposition of Monica DeLeon	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50)
8 9 10 11 12 13	Exhibit I: Exhibits 43 (TESLA-0000511), 53 (TESLA-0000308), 55 (TESLA-0000641), 56 (TESLA-0000135-TESLA- 0000136), and 64 (CITISTAFF-0000011- CITISTAFF-0000013) to the Deposition of Edward Romero	Tesla, Inc.; Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50)

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Date: October 29, 2019

FISHER & PHILLIPS LLP

By: /s/ Juan C. Araneda

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